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February 22, 2017

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Amendment of Parts 1 and 22 of the Commission's Rules with Regard to the Cellular Service, Including Changes in Licensing of Unserved Areas, WT Docket No. 12-40; Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550-3650 MHz Band, GN Docket No. 12-354**

Dear Ms. Dortch:

On February 17, 2017, Tamara Preiss, Andy Lachance, and Patrick Welsh of Verizon met separately with Rachael Bender, legal advisor to Chairman Pai, and Erin McGrath, legal advisor to Commissioner O'Reilly, to discuss issues raised in the above-referenced proceedings. We discussed the importance of the cellular and 3.5 GHz bands to Verizon's efforts to add capacity to its mobile network and accelerate wireless broadband deployment.

During the meeting, we reiterated Verizon's support for adopting power spectral density ("PSD") limits of 1000 W/MHz in urban areas and 2000 W/MHz in rural areas for cellular, consistent with our previous filings in the docket. These PSD limits are necessary to eliminate the bias in the current power rule towards narrow band technologies and to enable cellular licensees to deploy wide band technologies, like LTE, in the band without losing coverage. This step will provide clear consumer benefits, including higher quality and more widely available mobile broadband services. We also discussed how this rule change will not harm adjacent public safety licensees. We continue to support amending the cellular discontinuation of service rule to allow licensees to take down service for up to 180 days to allow them to transition to new technologies in the band without putting the license in jeopardy. And we oppose requiring licensees to use third party frequency coordinators to perform interim reviews of cellular license applications.

In addition to discussing the cellular rulemaking proceeding, Verizon also discussed the 3.5 GHz band and noted our continuing support for the steps taken to date by the Commission to establish the Citizens Broadband Radio Service ("CBRS") three-tiered spectrum access framework. We urged the Commission to make the band available for General Authorized Access ("GAA") use and to auction Priority Access Licenses ("PALs") quickly to ensure robust investment and innovation in the 3.5 GHz band.

Marlene H. Dortch  
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This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathon Green". The signature is written in a cursive, flowing style.

cc: Rachael Bender  
Erin McGrath